

FILED
 SEP 21 2022 *AK*
 CLERK, U.S. DISTRICT COURT
 NORTH DISTRICT OF CALIFORNIA *5 NP*

NC

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

DMR

Fredendk L. Blue Plaintiff,

vs.

Covenant Aviation Security, LLC Defendant(s).

CV22 5380
 CASE NO. _____

EMPLOYMENT DISCRIMINATION
 COMPLAINT

1. Plaintiff resides at:

Address *1544 Polk St #14*

City, State & Zip Code *San Francisco CA*

Phone *415-999-0048*

2. Defendant is located at:

Address *400 Quadrangle Drive Suite A*

City, State & Zip Code *Bolingbrook, IL 60440*

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred on this Court by 42 U.S.C. Section 2000e-5.

Equitable and other relief is sought under 42 U.S.C. Section 2000e-5(g).

4. The acts complained of in this suit concern:

a. ☐ Failure to employ me.

b. ☐ Termination of my employment.

- 1 c. ☐ Failure to promote me.
- 2 d. ☐ Other acts as specified below.
- 3 _____
- 4 _____
- 5 _____
- 6 _____
- 7 _____
- 8 _____

9 5. Defendant's conduct is discriminatory with respect to the following:

- 10 a. ☒ My race or color.
- 11 b. ☒ My religion.
- 12 c. ☒ My sex.
- 13 d. ☐ My national origin.
- 14 e. ☒ Other as specified below.

15 defamation of character

16 6. The basic facts surrounding my claim of discrimination are:

17 2/22 Human Resources Generalist requested

18 I write a letter regarding my religious headwear;

19 5/22, she brought up my religious body

20 fragrance.

21 The trainers who trained me all Hispanic

22 Latino and or Asian wasn't training me

23 proper or according to standard operational

24 process then started telling everyone

25 7. The alleged discrimination occurred on or about 2/2022 - 9/2022

26 (DATE)

27 8. I filed charges with the Federal Equal Employment Opportunity Commission (or the

28 California Department of Fair Employment and Housing) regarding defendant's alleged

I was difficult to work me, but the same trainer when training their own Race had no problems with the trainee. These same trainer began to defame my character by telling all the other trainers, managers and other high personal that I was difficult and was hard to train, was not get the tech, and while making comments this is not for you.

The lead, Roger, would put into question parts of my uniform stating that I had on the wrong required ones— he stated to intimidate me into placing me into Roles that I was not train properly or they would place me in dress to just be out their way.

I was bullied by other members of other personal— jasmine Harassed and singled out. Other managerial staff to get signed into the union. A very to to toxic working environment.

No matter how many times I went to the managerial staff their comment was

COMPLAINT

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// maybe this is not for you!!

2/22 - 9/22

discriminatory conduct on or about _____.

(DATE)

9. The Equal Employment Opportunity Commission issued a Notice-of-Right-to-Sue letter
(copy attached), which was received by me on or about _____.

(DATE)

10. Plaintiff hereby demands a jury for all claims for which a jury is permitted:

Yes _____ No ~~X~~

11. WHEREFORE, plaintiff prays that the Court grant such relief as may be appropriate,
including injunctive orders, damages, costs, and attorney fees.

DATED: _____

9/20/22

Medina P. Blue

SIGNATURE OF PLAINTIFF

(PLEASE NOTE: NOTARIZATION
IS NOT REQUIRED.)

PLAINTIFF'S NAME

(Printed or Typed)